

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: )  
Weston D. Wagner ) Bankruptcy No. 21-22145 JAD  
Carrie A. Wagner, ) Chapter 13  
Debtors ) Related to Document No. 53 and 54  
American Honda Finance Corporation )  
d/b/a Honda Financial Services, )  
Administrator for Honda Lease Trust, )  
Movant )  
vs. )  
Weston D. Wagner )  
Carrie A. Wagner, )  
Respondents )

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW come Weston and Carrie Wagner ("Debtors") by and through attorney Christopher M. Frye, Esquire and responds to the Movant's Motion for Relief from the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor was approved by the court to obtain a loan to fund the residual lease buyout of the 2019 Honda CRV. The Debtor obtained financing through Clearview FCU and the buyout due to the respondent was paid in full. The Debtor will imminently be filing a report of financing and an Amended Chapter 13 Plan to report the new loan and add payment to the Chapter 13 Plan.
5. Admitted.

6. The Debtor is without sufficient information to affirm or deny this averment.
7. Denied. The lease buyout has been paid in full.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court deny the Movant's motion as moot.

Dated: January 16, 2023

Respectfully submitted,

/s/Christopher M. Frye  
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